

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**  
*Reading Division*

IN RE: LUIS MIGUEL RIVERA	Case No. 25-10875-pmm Chapter 13
Freedom Mortgage Corporation, Movant	
vs.	
LUIS MIGUEL RIVERA , Debtor	

**OBJECTION TO CONFIRMATION  
OF DEBTOR'S CHAPTER 13 PLAN**

Freedom Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 3), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on March 4, 2025.
2. Movant holds a security interest in the Debtor's real property located at 1925 Reading Avenue, Reading, PA 19609 (the "Property"), by virtue of a Mortgage.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on March 4, 2025 (Doc 3).
4. The Plan includes payments toward the Note and Mortgage with Movant, however the figures used by the Debtor are inaccurate. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is \$97,376.31, whereas the Plan proposes to pay only \$96,068.76.
5. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§

1322(b)(3) and 1325(a)(5) and cannot be confirmed.

6. Movant objects to any plan which proposes to pay it anything less than \$97,376.31 as the pre-petition arrearage over the life of the plan.

**WHEREFORE**, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Ryan Srnik, PA Bar No. 334854

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com

**L.B.F. 9014-4**

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**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on March 20, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

I certify under penalty of perjury that the above document was sent using the mode of service indicated.

Date: March 20, 2025

/s/Andrew Spivack  
Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Ryan Srnik, PA Bar No. 334854  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
3825 Forrestgate Drive

Winston Salem, NC 27103  
Telephone: (844) 856-6646  
Facsimile: (704) 369-0760  
E-Mail: PABKR@brockandscott.com

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Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

MICHAEL A. CIBIK, Debtor's Attorney  
1500 Walnut Street  
Suite 900  
Philadelphia, PA 19102  
help@cibiklaw.com  
Debtor's Attorney

Via: ☒ CM/ECF ☐ 1st Class Mail ☐ Certified Mail ☐ e-mail:  
☐ Other:

SCOTT F. WATERMAN [Chapter 13],  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606  
Bankruptcy Trustee

Via: ☒ CM/ECF ☐ 1st Class Mail ☐ Certified Mail ☐ e-mail:  
☐ Other:

United States Trustee  
Office of United States Trustee  
Robert N.C. Nix Federal Building, 900 Market Street, Suite 320  
Philadelphia, PA 19107  
US Trustee

Via: ☒ CM/ECF ☐ 1st Class Mail ☐ Certified Mail ☐ e-mail:  
☐ Other:

LUIS MIGUEL RIVERA  
1925 READING AVENUE  
READING, PA 19609  
Debtor

Via: ☐ CM/ECF ☒ 1st Class Mail ☐ Certified Mail ☐ e-mail:  
☐ Other: